

EXHIBIT B

RANDALL S. LUSKEY (SBN: 240915)
 rluskey@paulweiss.com
**PAUL, WEISS, RIFKIND, WHARTON
 & GARRISON LLP**
 535 Mission Street, 24th Floor
 San Francisco, CA 94105
 Telephone: (628) 432-5100
 Facsimile: (628) 232-3101

ROBERT ATKINS (*Pro Hac Vice* admitted)
 ratkins@paulweiss.com
 CAITLIN E. GRUSAUSKAS (*Pro Hac Vice* admitted)
 cgrusauskas@paulweiss.com
 ANDREA M. KELLER (*Pro Hac Vice* admitted)
 akeller@paulweiss.com
**PAUL, WEISS, RIFKIND, WHARTON
 & GARRISON LLP**
 1285 Avenue of the Americas
 New York, NY 10019
 Telephone: (212) 373-3000
 Facsimile: (212) 757-3990

Attorneys for Defendants
 UBER TECHNOLOGIES, INC.;
 RASIER, LLC; and RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
 PASSENGER SEXUAL ASSAULT
 LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF JENNIFER
 HANDLEY IN SUPPORT OF
 DEFENDANTS' MARCH 21, 2025 BRIEF
 PURSUANT TO SPECIAL MASTER
 ORDER NO. 2, § III(6)**

This Document Relates to:
 ALL ACTIONS

Judge: Hon. Lisa J. Cisneros
 Courtroom: G – 15th Floor

DECLARATION OF JENNIFER HANDLEY

I, Jennifer Handley, having personal knowledge of the following state:

1. I am the Senior Legal Director, Global Safety, at Uber. I was first employed by Uber in December 2018 and have worked as in-house counsel for the past 6 years. My previous roles include Senior Counsel, Safety and Legal Director, Safety. In my current role, as has been the case throughout my tenure at Uber, I am responsible for providing legal advice to Uber's leadership and employees related to safety issues, procedures, and policy, among other legal advice. I offer this Declaration in the above-captioned matter in support of Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's March 21, 2025 brief pursuant to Special Master Order No. 2, § III(6) (ECF 2357). The facts set forth herein are true and correct and are based on my own personal knowledge, and I could and would competently testify thereto if called.

2. I am familiar with JCCP_MDL_PRIVLOG001171. It is a multi-tab spreadsheet that includes an analysis of sexual assault/sexual misconduct incident tickets used for Uber's U.S. Safety Report. As part of my role as in-house counsel for Uber, I provide the company legal advice concerning safety incidents, including classification. One of the tabs marked "Sev 1 Disc with Jen" is a reference to items that were flagged to discuss with me, as in-house legal counsel at Uber, and was for the purpose of seeking legal advice. In addition, there is information contained in this tab which communicates prior legal advice. This document was created for the primary purpose of allowing in-house counsel, including myself, to review this data and provide legal advice regarding the accuracy and proper categorization of the data, and regarding the Safety Report and safety issues more broadly, in light of the legal risks posed by public statements and public release of data related to safety issues.

3. I am familiar with the document referenced by privilege log number as JCCP_MDL_PRIVLOG004452. It is a confidential and privileged document that was attached to a chat thread I authored. The corresponding chat thread was a discussion between myself and Renan Dias, Data Scientist. As part of my role as in-house counsel for Uber, I provide the company legal advice concerning Uber's Safety Taxonomy and Uber's U.S. Safety Report. This confidential and

1 privileged document was authored by Mr. Dias and provided to me for the purpose of facilitating my
2 legal advice to Mr. Dias and others in the company, and the document reflects my legal advice.

3 4. I am familiar with the document identified on the privilege log as
4 JCCP_MDL_PRIVLOG004020. It is an internal memorandum stamped "Attorney-Client Privileged
5 & Confidential," pertaining to Uber's policy positions regarding "Earners Account Deactivations and
6 Appeals/Review." This document was created with the intention of seeking legal advice, and
7 incorporates not only legal advice that I provided, but also legal advice from then-Director,
8 Employment Emily Smith and then-Global Senior Counsel, Account Actioning, Fraud & Identity
9 Mostafa Abdelkarim. The memo provides guidance to Uber stakeholders on external communications
10 regarding deactivations in light of the legal and litigation risk entailed by public statements regarding
11 deactivations of independent drivers.

12
13 I declare under penalty of perjury that the foregoing is true and correct.

14
15 Executed in Denver, Colorado on March 20, 2025.

By: Jennifer Handley

Jennifer Handley